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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

10 JESSE CRUZ, an Individual; MARIA CRUZ,
an Individual; GEOVANY MARTINEZ, an
Individual,

Case No.: 02:11-cv-00342-LDG-VCF
Consolidated:
2:12-cv-00051
2:12-cv-01627

Plaintiffs,

vs.

DANNY DURBIN, an individual;
CHAMPION TRANSPORTATION
SERVICES, INC., a foreign corporation;
CHAMPION LOGISTICS GROUP, INC., a
foreign corporation; DOES I through XX,
inclusive; and ROE BUSINESS ENTITIES I
through XX, inclusive.

Defendants.

**STIPULATION AND ORDER TO
CONTINUE DEADLINE FOR REPLIES
TO DISPOSITIVE MOTIONS
(Second Request)**

19 | AND ALL OTHER RELATED ACTIONS.

21 Pursuant to F.R.C.P. 6, and Local Rules 6-1, 6-2, and 7-1, the parties, by and through
22 their undersigned attorneys of record, stipulate to a 14 day extension to the deadlines set for
23 replying to dispositive motions. The current reply deadline is July 16, 2015. The proposed
24 deadline for replies shall be extended to July 30, 2015.

25 All the remaining parties in this case have stipulated to the extension.

26 Pursuant to F.R.C.P. 6(b)(1), good cause exists for the extension because counsel for
27 Plaintiffs, Jesse Cruz, Maria Cruz and Geovany Martinez, have been unable to meet the current
28 reply deadline due to scheduling conflicts with a two week trial that is currently ongoing.

1 Counsel for Plaintiffs has conferred with the remaining parties in this case and none have
2 objected to the extension.

3 In addition, there is no prejudice or any known conflict with potential trial dates.

4 DATED this 16th day of July, 2015.

DATED this 16th day of July, 2015.

5 **LADAH LAW FIRM**

6 /s/ *Ramzy P. Lada, Esq.*

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14 DATED this 16th day of July, 2015.

15 **STEPHENSON & DICKINSON**

16 /s/ *Michael E. Hottman, Esq.*

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DATED this 16th day of July, 2015.

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/s/ *Craig A. Newby, Esq.*

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